

STATEMENT OF BASIS

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0109941
to discharge to waters of the State of Louisiana.
AI No.: 3234 / Activity No.: PER20060001

THE APPLICANT IS: Travel Centers of America
Lafayette Travel Center
1701 North University Avenue
Lafayette, Louisiana 70507

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Bonnie Fleming

DATE PREPARED: January 30, 2007

1. PERMIT STATUS

- A. LPDES permit (LA0109941) - Effective date: June 1, 2000
Expiration date: May 31, 2005
EPA has not retained enforcement authority.
- B. LWDPS permit – NA
LWDPS permit effective date: NA
LWDPS permit expiration date: NA
- C. Date Application Received: June 27, 2006

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY – Truckstop

The Lafayette Travel Center is an existing truckstop with a diesel fuel island, an automobile fuel island, 18-wheeler parking area, restaurant, shower facilities, restrooms, laundry facilities, repair shop, and convenience store. All sanitary wastewater from the facility goes to the city sewer system. Stormwater runoff from the diesel fuel island, gasoline fuel island, truck parking area, tank pad area, and washdown water from the diesel fuel island is directed to an oil/water separator and discharged to a roadside ditch (Outfall 001).

B. FEE RATE

- 1. Fee Rating Facility Type: minor
- 2. Complexity Type: I
- 3. Wastewater Type: III
- 4. SIC codes: 5541, 7699, 5812

Statement of Basis for
TravelCenters of America / Lafayette Travel Center
LA0109941 / AI 3234
Page 2

C. LOCATION - 1701 North University Avenue, Lafayette, Lafayette Parish
Latitude +30° 15' 09", Longitude -92° 02' 15"

3. **OUTFALL INFORMATION**

Outfall 001

Discharge Type: Stormwater runoff from the fuel islands and parking areas, tank pads, and washdown water
Treatment: Oil/water separator
Location: at the point of discharge from the oil/water separator on the northeastern corner of the property
Flow: Flow varies with rainfall
Discharge Route: Local Drainage, thence to Coulee Mine, and thence to the Vermilion River

4. **RECEIVING WATERS**

STREAM – Outfall 001 – local drainage, thence to Coulee Mine, and thence to the Vermilion River

BASIN AND SEGMENT – Vermilion River Basin – Subsegment 060801

DESIGNATED USES -
a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
d. agriculture

5. **EXISTING EFFLUENT LIMITS**

The usage of concentration limits is based on best professional judgment since flows for this type of facility are variable and estimated.

See rationale for types of wastewaters below. See outfall information descriptions for associated outfalls above in Item 3.

6. **PROPOSED EFFLUENT LIMITS**

BASIS – See rationale below. Stormwater from this facility’s SIC codes is not regulated under LAC 33:IX.2511.B.14. Based on review of DMRs since January 2003 it is determined that regulation of this facility’s stormwater continues to be warranted under the provision of LAC 33:IX.2511.A.9. See item 7B below. SWP3 will be included in the permit as well as the limitations and monitoring as in the previous permit.

Statement of Basis for
 TravelCenters of America / Lafayette Travel Center
 LA0109941 / AI 3234
 Page 3

7. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

Since January 1, 2003 one compliance order has been issued. A Consolidated Compliance Order & Notice of Potential Penalty was issued on April 6, 2003 for Discharge Monitoring Report violations and unpermitted outfalls.

B. DMR Review/Excursions

16 DMRs were submitted and reviewed for the period of January 2003-September 2006. Five TOC and eight oil and grease exceedances were noted. 33% failed for TOC and 53% failed for oil and grease of the total samples reported.

Parameter	TOC 1/3 mo.	O&G 1/3 mo.	pH
Limit	50mg/L	15mg/L	6 - 9
January 2003	40.1	20	6.11
February 2003	24.7	13	6.28
March 2003	68.8	19	6.73
April 2003	37.3	19.33	6.77
May 2003	97	31	6.73
June 2003	53.3	12	6.95
July 2003	24	11	6.94
August 2003	42.5	10	6.24
September 2003	30.8	9	6.41
October 2003	4.9	ND	6.34
November 2003	24.5	ND	6.47
December 2003	No discharge	No discharge	No discharge
Jan - March 2004	No DMR	No DMR	No DMR
April - June 2004	15	35.7	6.81
July - Sept. 2004	112	22	6.2
Oct. - Dec. 2004	No DMR	No DMR	No DMR
Jan. - March 2005	No DMR	No DMR	No DMR
April - June 2005	No DMR	No DMR	No DMR
July - Sept. 2004	No DMR	No DMR	No DMR
Oct. - Dec. 2005	173	27	6.12
Jan. - March 2006	No DMR	No DMR	No DMR
April - June 2006	No DMR	No DMR	No DMR
September 2006	21.5	10	6.11

8. ENDANGERED SPECIES

The receiving waterbodies and proposed discharge are not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of

Statement of Basis for
TravelCenters of America / Lafayette Travel Center
LA0109941 / AI 3234
Page 4

the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

9. 303 (d) LISTED WATERBODIES

Subsegment 060801, Vermilion River, is not listed on LDEQ's Final 2004 303(d) list as impaired. However, subsegment 060801 was previously listed as impaired for organic enrichment/low DO, carbofuran, phosphorus, nitrogen, pathogen indicators, suspended solids/turbidity/siltation, and turbidity, for which the below TMDLs have been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDLs and/or water quality studies. The LDEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDLs for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

The following TMDLs have been established for subsegment 060801:

TMDL for Oxygen Demanding Nutrients

Seasonal TMDLs have been established for the Summer Season and the Winter Season for CBOD₅ and NH₃-N. The TMDLs only apply to certain dischargers who were included in the seasonal models. This permit is for discharges from a truckstop which does not discharge nutrients. The Truckstop does not have a sanitary discharge and it has been determined that no activities at the facility will contribute to the addition of nutrients to the system which has been identified causing the dissolved oxygen impairment of the water body.

TMDL for TSS, Turbidity & Siltation

The TMDL document states that "Given that there is no criterion for TSS in the Louisiana water quality standards and there is a moderate to strong relationship between turbidity and TSS as evidenced by the correlation coefficients shown in Table 3, a listing under both parameters is considered here to be duplicative. ... EPA believes that since this duplicity occurs regularly it supports the belief that these duplicate listings were likely attributable to different ways of expressing the same concern of water impairment by different individuals charged with preparing 305(b) reports, 303(d) lists, or 319 assessments." In this TMDL, TSS was used as an indicator for siltation or bottom deposits resulting from inorganic sediment loads.

The TMDL only addresses TSS from the landform contribution of TSS/sediment and does not address the insignificant point source contribution. The point sources are minor contributors and discharges of organic suspended solids from point sources are already addressed by LDEQ through their permitting of point sources to maintain water quality standards. Therefore, the LPDES permit limitations for TSS are sufficient to protect the water body from a source which is considered by the TMDL document to be an insignificant point source contribution.

Statement of Basis for
TravelCenters of America / Lafayette Travel Center
LA0109941 / AI 3234
Page 5

TMDL for Fecal Coliform

The TMDL states that Louisiana's water quality standards for protection of the primary contact recreation use and the secondary contact recreation use are adequate to protect the water body; "therefore, there will be no change in the permit requirements based upon a waste load allocation resulting from this TMDL." This facility does not discharge sanitary wastewater; therefore, the TMDL for fecal coliform does not apply to this facility.

TMDL for Carbofuran

The TMDL is based on EPA developed numeric targets appropriate for freshwater (0.13 µg/l) and marine (0.23 µg/l) environments. It states that "no introduction of carbofuran, which causes local concentrations to be greater than the numeric target, will be authorized. Ambient monitoring for carbofuran will be conducted for three years to obtain additional data. At the end of three years, the data will be analyzed to determine compliance with the numeric target for freshwater and marine environments." This facility will not be a source of carbofuran; therefore its operation should not have any impact on the carbofuran concentration in the water body or on future development of TMDLs for this broad spectrum carbamate pesticide.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation
Office of Environmental Services Public Notice Mailing List

Statement of Basis for
TravelCenters of America / Lafayette Travel Center
LA0109941 / AI 3234
Page 6

Rationale for Lafayette Travel Center

1. **Outfall 001** – Stormwater discharge from the entire facility*

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg.: Daily Max (mg/l)	<u>Reference</u>
Flow (GPD)	---: Report	Similar discharges** (BPJ); prior permit
TOC	---: 50 mg/l	Similar discharges** (BPJ); prior permit
Oil and Grease	---: 15 mg/l	Similar discharges** (BPJ); prior permit
pH	6.0 - 9.0 su	Similar discharges** (BPJ); prior permit

Treatment: Oil/water separator

***Monitoring Frequency:** Once per quarter for all parameters at the point of discharge of stormwater runoff from the northeastern corner of the facility.

***Stormwater** will continue to be regulated at the facility based on past performance. See Item 6 above, permit exceedances and failure to monitor and report as required by the prior permit.

****Limits Justification:** Limits and monitoring frequencies are based on BPJ and past regulation of similar discharges.

BPJ Best Professional Judgment
GPD Gallons per Day
su Standard Units

NOTE
For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

Storm Water Pollution Prevention Plan (SWP3) Requirement

A SWP3 is included in the permit since there is a potential for storm water contamination from processes including vehicle fueling, vehicle maintenance and fuel area washdown wastewater.

The SWP3 shall be updated and maintained with sixty days from the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see narrative requirements of the Draft Permit).